

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA <i>ex rel.</i>)	
LIEBMAN, <i>et al.</i> ,)	Case No.: 3:17-cv-00902
)	
Plaintiff-Relators,)	JUDGE CAMPBELL
)	MAGISTRATE JUDGE HOLMES
v.)	
)	
METHODIST LE BONHEUR HEALTHCARE,)	
<i>et al.</i> ,)	
)	
Defendants.)	
)	

**UNITED STATES' MOTION FOR LEAVE
TO FILE CERTAIN EXHIBITS UNDER SEAL**

The United States respectfully moves the District Court pursuant to Local Rule 5.03 for leave to file these documents under seal:

ECF Nos. 352-1, 352-3, 352-4, 352-5, and 352-10

ECF Nos. 353-4, 353-6, 353-7, 353-11, 353-14, and 353-19

ECF No. 354-1

ECF Nos. 356-8, 356-9, and 356-11

ECF Nos. 357-1, 357-2, 357-3, and 357-9

ECF No. 358-4

As good cause for the motion, the United States states as follows:

1. Counsel for non-party West emailed the United States this morning and asked the United States to file the above exhibits under seal pursuant to paragraph three of the confidentiality order in this case concerning documents that a party designates as confidential in that they may contain proprietary business information. ECF No. 108.

2. Counsel for West and the United States have not yet agreed as to whether each of these documents should be sealed, but counsel have agreed to discuss these issues in the coming days and expect that they will come to an agreement during June 2023. If the parties determine that any of the above entries do not need to be sealed, they will promptly advise the Court.

3. Counsel for the Methodist Defendants consents to this motion.

Respectfully submitted,

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United States Attorney
Middle District of Tennessee

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2023, a true and correct copy of the foregoing was served via email to the following:

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s/ Ellen Bowden McIntyre _____
ELLEN BOWDEN MCINTYRE
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